

EXHIBIT 14

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA

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5 JENNIE QUAN, individually and as
6 successor in interest to BENJAMIN
CHIN, deceased,

7 Plaintiffs,

8 vs. Case No. No. 2:24-cv-04805-MCS-KS

9 COUNTY OF LOS ANGELES;
10 MARISOL BARAJAS; HECTOR
VASQUEZ; and DOES 3-10, inclusive,

11 Defendants.

12 _____ /
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14 STENOGRAPHIC REPORTER'S TRANSCRIPT OF
15 REMOTE DEPOSITION OF PAUL V. GLINIECKI, M.D.

16 MONDAY, JULY 21, 2025
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21
22 Reported Stenographically by:
23 KIMBERLY D'URSO, CSR 11372, RPR
24 Job No. 18349
25

1 Q. And was there an exit wound associated with
2 that shot?

3 A. Yes, there was.

4 Q. And where was the exit?

5 A. Right lateral hip.

6 Q. What, in essence, did that bullet pass through
7 in the body?

8 A. The skin, the abdominal wall muscles, the
9 peritoneum, and through the bone, the ilium on the right
10 side, the iliac crest, and went through some muscle and
11 soft tissue, and exited the skin.

12 Q. And what was the direction of that wound with
13 the body in an anatomical position?

14 A. Left to right, front to back, 45-degree angle;
15 and downwards, 10-degree angle.

16 Q. So just so I can understand your angles, the
17 45-degree angle of front to back, so are you saying, for
18 example, if it was directly front to back, would that be
19 90 degrees?

20 A. Yes.

21 Q. So it's --

22 (Simultaneous speakers.)

23 A. Or perpend -- I sometimes just say
24 "perpendicular to the body."

25 Q. So if we had in mind a 90-degree angle, you're

1 saying it's front to back, but more -- if we slice that
2 in half, more at a 45-degree angle.

3 A. Correct.

4 Q. And then the downward component, again, that
5 would be 10 degrees downward?

6 A. Correct.

7 Q. And so there would have been no bullet, at
8 least recovered by you, with respect to this shot; is
9 that correct?

10 A. That is correct.

11 Q. And you note that this is potentially fatal;
12 correct?

13 A. That is correct.

14 Q. And why did you list it as "potentially fatal"?

15 A. Well, in my opinion, because it didn't enter
16 any major blood vessels. It's not a rapid death.

17 There's no rapid bleeding or extensive bleeding.

18 However, you are hitting bone and soft tissue
19 and smaller blood vessels, so theoretically, there can
20 be a lot of bleeding, causing stress on the body, too.

21 So that's why I did say "potentially fatal."

22 And also, if it's not treated, or if they do
23 treat it and it becomes infected at a later time and it
24 causes his death, then, of course, that would be a fatal
25 wound.

1 So, it's just there's many multiple factors
2 when I make that opinion. I don't think it's a rapidly
3 fatal wound, but I think it is potentially fatal if not
4 treated or not properly taken care of.

5 Q. And if the -- if the wound was properly treated
6 and taken care of, in your opinion, is that a
7 potentially survivable wound?

8 A. Yes. In my opinion, that would be a survivable
9 wound, and most likely would be.

10 Q. And at least that type of wound would be
11 generally associated with pain?

12 A. Yes.

13 Q. Going to the next gunshot wound to the back,
14 you list it as gunshot wound number 2. Can you please
15 tell us where the entry was?

16 A. Yes. It's the lower back or the lumbar region
17 of the back.

18 Q. And did you do any measurements in terms of top
19 of the head or where it was with respect to the
20 posterior midline?

21 A. Yes.

22 Q. Can you please tell us what those are?

23 A. It's one inch to the right of the posterior
24 vertical midline of the back, and 28 and 1/2 inches from
25 the top of the head, and 40 and 1/2 inches above the

1 heel.

2 Q. So it's close to the middle of the back; is
3 that correct?

4 A. Correct.

5 Q. About one inch from the middle of the back?

6 A. Correct.

7 Q. And what did that bullet pass through after
8 entering the body?

9 A. Of course it goes through the skin. Goes
10 through some of the muscles of the posterior back.
11 Passes through the vertebral column, which is L1 and
12 L2 -- I'm sorry -- L2 and L3, and goes through some
13 muscle and soft tissue and hits the liver and the
14 diaphragm, and exits the body through the abdominal wall
15 and skin.

16 Q. Where, approximately, was the exit in relation
17 to the measurements you gave us earlier? In other
18 words, did you measure the exit wound with respect to
19 the midline or the top of the head?

20 A. Yes.

21 Q. Can you please tell us what those measurements
22 are?

23 A. I'm looking at my diagram but -- let me see. I
24 I wrote -- I have to check the report.

25 Q. Okay. Take your time. You can check it any

1 time you need. If it helps you at all, I think at
2 the --

3 A. I -- I found it.

4 Q. Okay. Good.

5 A. It's on page 8. *47 and a 1/2 inches above the
6 right heel, and 23 inches from the top of the head.

7 Q. And where was it, in terms of the midline?

8 A. *Four and half inches to the right of the
9 midline.

10 Q. And did that wound have an exit?

11 A. Yes.

12 Q. What was the direction of that wound within the
13 body, with the body in an anatomical position?

14 A. Direction is left to right, 45-degree angle,
15 upwards; and back to front, about 45-degree angle.

16 Q. So was it -- with the body in an anatomical
17 position, was it approximately *a 45-degree angle
18 downward?

19 A. Well, it would be upwards.

20 Q. I'm sorry. 45-degree angle upward?

21 A. Correct.

22 Q. And to get that upward trajectory, Doctor,
23 would that at least be consistent with the decedent
24 being bent forward at the waist, with the shooter to the
25 decedent's back?

1 A. That's a possibility, yes.

2 Q. That would be one explanation, at least, for
3 the upward trajectory?

4 A. Yes.

5 Q. In your opinion, was this wound fatal?

6 A. Yes.

7 Q. And why?

8 A. Because unlike the other gunshot wound number
9 1, this one went to the liver and would cause massive
10 bleeding.

11 Q. Was there evidence -- did it also go through
12 the diaphragm? I think you said it did.

13 A. Yes, I did.

14 Q. Was there evidence of internal bleeding at the
15 time of autopsy?

16 A. Yes, there is evidence of bleeding.

17 Q. And can you --

18 A. I'm sorry. But he was operated on, so I'm not
19 really too sure.

20 Q. Okay. Since there was medical intervention,
21 it's hard to tell what bleeding came from what?

22 A. Correct. And also, the blood that's lost
23 during processing of the body and at the scene, it's
24 hard to make a true opinion about the amount of blood
25 lost or caused by the gunshot wound.

1 Q. And you indicate in your report, and I think on
2 page 3, at least, that: "This wound is considered to be
3 rapidly fatal due to major injuries to the liver."

4 A. Yes.

5 Q. And is it your general understanding that at
6 least the decedent was alive by the time he got to the
7 hospital and they attempted surgical intervention?

8 MR. HURRELL: Objection. That calls for
9 speculation.

10 THE WITNESS: I don't know if I could answer
11 that. I wasn't there when that happened.

12 MR. GALIPO: Fair enough.

13 BY MR. GALIPO:

14 Q. I'm hoping that they do surgeries on live
15 people, but I don't know for sure. I wasn't there
16 either.

17 A. Yeah, I mean, sometimes they do surgery on
18 people that are not -- I mean, hopefully they still had
19 a pulse or something going on. But sometimes they do it
20 for practice, maybe. I'm not too sure why, but it just
21 depends. And I wasn't there, so I don't have the
22 vitals, so I don't know.

23 Q. Okay. But a person with this type of wound
24 could clearly survive for minutes; is that fair?

25 A. Oh, yes. It's theoretically possible if he got

1 STATE OF CALIFORNIA)
2) ss:
COUNTY OF BUTTE)

3 I, KIMBERLY E. D'URSO, do hereby certify:

5 That the witness named in the foregoing
6 deposition was present remotely and duly sworn to testify
7 to the truth in the within-entitled action on the day and
8 date and at the time and place therein specified;

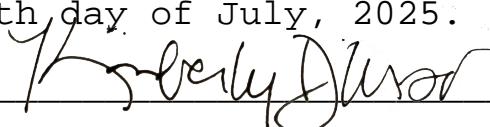
9 That the testimony of said witness was reported
10 by me in shorthand and was thereafter transcribed through
11 computer-aided transcription;

12 That the foregoing constitutes a full, true and
13 correct transcript of said deposition and of the
14 proceedings which took place;

15 Further, that if the foregoing pertains to the
16 original transcript of a deposition in a federal case,
17 before completion of the proceedings, review of the
18 transcript [] was [] was not requested.

19 That I am a certified stenographic reporter and
20 a disinterested person to the said action;

21 IN WITNESS WHEREOF, I have hereunder subscribed
22 my hand this 29th day of July, 2025.

23 

24 KIMBERLY D'URSO, CSR NO. 11372, RPR
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